

Center for Medicaid and State Operations/Survey and Certification Group

Ref: S&C-05-17

DATE: February 10, 2005

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Description of Recent Changes Made to State Operations Manual (SOM), Appendix PP

Letter Summary

- Transmittal 4 was issued 11/12/2004. It contained revised guidance for Tag F314, Pressure Ulcers (Sores) and a small addition to F309, Quality of Care concerning non-pressure ulcers;
- Transmittal 5 was issued 11/19/2004. It made corrections to typographical errors in the new internet SOM, Appendix PP, moved certain regulatory text that had been tagged to "Refer to" certain Tags to the Tags where they belonged; and
- Transmittal 5 also contained regulatory language changes at certain Tags that were necessary due to regulation revisions.

Background

The Centers for Medicare & Medicaid Services (CMS) has a project underway to convene expert panels to assist in developing revisions to interpretive guidelines at several key Tags in the State Operations Manual (SOM), Appendix PP. This ongoing project has now produced the first of the changes to the SOM. New guidance for Tag F314, Pressure Ulcers (Sores), was issued in Transmittal 4 on 11/12/04. The guidance contains, in addition to interpretive guidelines, an investigative protocol and specific severity guidance for determining the correct level of severity of outcome to residents from deficiencies at F314. As part of the F314 revision, a minor addition was made to interpretive guidelines at F309, Quality of Care, to provide information on non-pressure ulcers. Each Tag revision is expected to follow a similar format.

A second change was made to the SOM, Appendix PP in Transmittal 5, which was issued 11/19/2004. In this Transmittal, the following changes were made:

- We corrected typographical errors;
- We moved certain regulatory text and guidelines that had no Tag numbers, but instead referred to certain Tags, to the Tags where they belong. The language that was moved is considered part of the text of the Tag to which it was moved. For the purpose of determining if a deficiency should be designated as substandard quality of care, survey teams should refer to the Tag and where it is located, even though some language from other regulatory sections may have been added to the Tag;
- We changed certain regulatory language due to 2003 changes to the regulations; and

- We changed Appendix P, the Survey Protocol for Long Term Care Facilities, to remove the investigative protocol for pressure ulcers that was part of Task 5C, Resident Review. This protocol is now replaced with the new investigative protocol at F314 in Appendix PP.

Discussion

CMS plans several more Tag revisions over the next several months. Each Tag is proceeding through expert panel development, public comment, and panel review of comments, with revisions based on those comments, and then internal clearance. For this reason, each Tag is on its own time schedule for issuance as final. We expect changes to the following Tags in FY '05:

- F315 & F316, Incontinence and Catheters (the two tags will be collapsed into one, F315);
- F501, Medical Director;
- F248 & F249, Activities and Activity Director;
- F520 & F521, Quality Assessment and Assurance (the two Tags will be collapsed into one F520); and
- F323 & F324, Accidents and Supervision (the two Tags will be collapsed into one, F323).

In addition, we will be adding new guidance, the Psychosocial Outcome Guide, to Appendix P, at Part V, Deficiency Categorization. This new Guide supplements the general guidance on severity determination at this Part with additional guidance for determining severity based on psychosocial outcomes of any deficiency to residents.

In FY '06, we expect changes to the Tags:

- F329, Unnecessary Drugs;
- The entire Pharmacy section at 483.60;
- F325, Nutrition;
- F371, Safe Food Handling; and
- F309 to provide new guidance on issues of pain and palliative care.

We will be continuing our efforts to select and revise additional Tags, once we have determined which Tags need revision.

For questions on this memorandum, please contact Karen Schoeneman at (410) 786-6855 or via e-mail at kschoeneman@cms.hhs.gov.

Effective Date: The information in this memorandum should be shared with survey staff within 30 days of the publication date.

Training: The information contained in this announcement should be shared with all long term care survey staff, their managers and the state/RO training coordinators.

Thomas E. Hamilton

cc: Survey and Certification Regional Office Management (G-5)

Attachment

CMS Manual System

Pub. 100-07 State Operations

Provider Certification

Department of Health &
Human Services (DHHS)
Centers for Medicare &
Medicaid Services (CMS)

Transmittal 4

Date: NOVEMBER 12, 2004

SUBJECT: Guidance to Surveyors for Long Term Care Facilities

I. SUMMARY OF CHANGES: Appendix PP, Tag F314, current Guidance to Surveyors, is entirely replaced by this revision which is to be inserted in the Appendix immediately after the regulatory text for F314. To complement the revision of F314, new language is being added to Tag F309 to include certain definitions of non-pressure related ulcers. Hypertext links are added for all Web sites listed in the Overview, (www.ahrq.gov, www.npuap.org, www.amda.org, www.medqic.org, www.wocn.org, and www.healthinaging.org). Hypertext link is added in the Endnotes section to link to a CMS site (www.cms.hhs.gov/medicaid/survey-cert/siqhome.asp) for further information.

NEW/REVISED MATERIAL - EFFECTIVE DATE*: November 12, 2004

IMPLEMENTATION DATE: November 12, 2004

Disclaimer for manual changes only: The revision date and transmittal number apply to the red italicized material only. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual not updated.)

(R = REVISED, N = NEW, D = DELETED) – (Only One Per Row.)

R/N/D	CHAPTER/SECTION/SUBSECTION/TITLE
R	Appendix PP/483.25/Quality of Care/Tag F309
R	Appendix PP/483.25(c)/Pressure Sores/Tag F314

III. FUNDING: Medicare contractors shall implement these instructions within their current operating budgets.

IV. ATTACHMENTS:

	Business Requirements
x	Manual Instruction
	Confidential Requirements
	One-Time Notification
	Recurring Update Notification

*Unless otherwise specified, the effective date is the date of service.

CMS Manual System

Pub. 100-07 State Operations

Provider Certification

Transmittal 5

Department of Health &
Human Services (DHHS)
Centers for Medicare &
Medicaid Services (CMS)

Date: November 19, 2004

SUBJECT: Revisions to Appendix P (Survey Protocols for Long Term Care Facilities) and
Appendix PP (Guidance to Surveyors for Long Term Care Facilities)

I. SUMMARY OF CHANGES: In Appendix P, Task 5C, Resident Review, Part H, Investigative Protocol, Pressure Sore/Ulcer is deleted. The Regulatory and Guidance to Surveyors text that is already part of Appendix PP in areas that are tagged to “refer” to another Tag, have been moved to the proper Tags. Revisions made to Appendix PP (described below) are due to changes in the regulatory language.

NEW/REVISED MATERIAL - EFFECTIVE DATE*: Upon Issuance

IMPLEMENTATION DATE: Upon Issuance

Disclaimer for manual changes only: The revision date and transmittal number apply to the red italicized material only. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual not updated.)

(R = REVISED, N = NEW, D = DELETED) – (Only One Per Row.)

R/N/D	CHAPTER/SECTION/SUBSECTION/TITLE
D	Appendix P: Task 5C Resident Review, Part H, Investigative Protocol, Pressure Sore/Ulcer is deleted. It has been replaced by a new protocol at Appendix PP, Tag F314.
R	Appendix PP: The following Tags have been changed to move all text that is part of that Tag to be located with the other text of the Tag: F154, F156, F164, F246, F252, F272, F279 F280, F285, F514, and F516. Guidance that was present at some of the sections that were moved that refer the reader to the Tag to which they belong has been removed, since the language is now at the appropriate Tag.
R	Appendix PP: Regulatory language revisions made at F150, F156 - 483.10(b)(7)(iv), F386, 483.70(a) – untagged, 483.70(a)(4) – untagged.
R	Appendix PP: Corrections made due to text errors at F333 (Tag was missing), F363 (Tag was missing), F428 (regulatory text missing).

III. FUNDING: Medicare contractors shall implement these instructions within their current operating budgets.

IV. ATTACHMENTS:

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***Unless otherwise specified, the effective date is the date of service.**